

ORGANIZATION FOR THE PROTECTION
AND ADVANCEMENT OF SMALL
TELEPHONE COMPANIES

21 DUPONT CIRCLE, N.W., SUITE 700
WASHINGTON, D.C. 20036
202/659-5990 • 202/659-4619 (FAX)

DOCKET FILE COPY ORIGINAL

June 7, 1994

RECEIVED

JUN - 7 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

Re: Administration of the North American
Numbering Plan
CC Docket No. 92-237
Phases One and Two

Dear Mr. Caton:

Please find enclosed for filing the original and eleven copies of the Organization for the Protection and Advancement of Small Telephone Companies' comments in the above-captioned proceeding.

Thank you for your assistance in this matter.

Sincerely,

Lisa M. Zaina
General Counsel

No. of Copies rec'd
List A B C D E

02/11

DOCKET FILE COPY ORIGINAL

RECEIVED

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

JUN - 7 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Administration of the North
American Numbering Plan

)
)
)
)

CC Docket No. 92-237

**COMMENTS OF
THE ORGANIZATION FOR THE PROTECTION AND
ADVANCEMENT OF SMALL TELEPHONE COMPANIES**

OPASTCO
21 Dupont Circle, NW
Suite 700
Washington, DC 20036
(202) 659-5990

June 7, 1994

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Administration of the North)	CC Docket No. 92-237
American Numbering Plan)	

**COMMENTS OF
THE ORGANIZATION FOR THE PROTECTION AND
ADVANCEMENT OF SMALL TELEPHONE COMPANIES**

I. INTRODUCTION

On April 4, 1994, the Federal Communications Commission (FCC or Commission) released the text of a Notice of Proposed Rulemaking¹ concerning the reorganization and administration of the North American Numbering Plan (NANP). The Organization for the Protection and Advancement of Small Telephone Companies (OPASTCO) hereby submits its comments in response to the Commission's NPRM.

OPASTCO is a national trade association of more than 440 independently owned and operated telephone companies serving rural areas of the United States and Canada. Its members, which include both commercial companies and cooperatives, together

¹In the Matter of Administration of the North American Numbering Plan, CC Docket No. 92-237, Notice of Proposed Rulemaking, 59 FR 24103 (May 10, 1994). (NPRM)

serve over two million customers.

As local exchange carriers (LECs), OPASTCO's member companies are very interested in any change in the administration of the NANP. Numbering resources are vitally important to our companies both externally (in affecting the manner in which they offer services to their customers) and internally (affecting network operations and call routing functions).

OPASTCO believes the Alliance for Telecommunications Industry Solutions (ATIS) is the most qualified organization to administer the NANP. Additionally, ATIS would be able to assume the responsibility of assigning Central Office (CO) codes and administering other numbering issues such as nationwide uniform dialing arrangements. OPASTCO also believes the costs associated with this solution would be substantially less than creating an entirely new entity.

II. ATIS IS BEST SUITED TO ASSUME NANP ADMINISTRATION AND POLICY FUNCTIONS

In its NPRM, the Commission asks "whether ATIS or some other component of ATIS could handle future NANP administration."² OPASTCO believes that ATIS, given its experience, is the most capable entity to handle these administrative duties. In fact, ATIS has already established the Industry Numbering Committee (INC). This forum has begun to look at numbering solutions for personal communications services (PCS) in addition to numerous other numbering issues.

²NPRM at para. 15.

OPASTCO recommends that the Commission allow ATIS to sponsor a committee for development of NANP policy, hereinafter called the industry oversight committee. OPASTCO suggests that the seats on this board should be assigned to various industry segments representing such interests such as large and small LECs, interexchange carriers (IXCs), PCS providers, and competitive access providers (CAPs). This policy board could also consider input from the FCC, World Zone 1 regulators, and any other interested parties.

ATIS is accustomed to building consensus given its broad industry representation. Given the need for cooperation in numbering issues due to interoperability and interconnection requirements, a consensus approach is exactly what is required. Therefore, OPASTCO feels the Commission should empower ATIS to establish an industry oversight committee to develop NANP policy. In the extreme case that this committee could not solve a dispute, the parties would have a final recourse to the FCC.

OPASTCO feels that in order to minimize costs, the day-to-day administration of the NANP, under the policies reached by the industry oversight committee, could be contracted out. This would be similar to the handling of the 800 Service Management System.

OPASTCO strongly supports the Commission's tentative conclusion that the NANP administrative functions would best be performed by a single, non-government entity, subject to FCC "oversight but also separate from this Commission and not closely

identified with any particular industry segment."³ OPASTCO believes that ATIS fits this role perfectly, and due to its recognition within the industry and other numbering experience, it would also be well-positioned to make policy decisions.

III. DECISIONS CONCERNING CENTRAL OFFICE (CO) CODES, NON-UNIFORM DIALING ARRANGEMENTS, AND OTHER NUMBERING ISSUES SHOULD BE PERFORMED BY THE ATIS-SPONSORED INDUSTRY OVERSIGHT COMMITTEE

OPASTCO supports the Commission's conclusion that the new NANP administrator should "perform the additional functions associated with the assignment of CO codes."⁴ OPASTCO feels that ATIS would be able to assign these codes in an efficient manner. Volatile decisions on PCS and local number portability also demand the consensus approach that ATIS can provide.

OPASTCO believes that in the case of non-uniform dialing arrangements, some sort of national coordination is necessary in order to eliminate high operating costs necessitated by individual state plans. A national consensus by the ATIS-sponsored NANP board could eliminate the problem of higher individual state administrative costs due to these non-uniform dialing arrangements.

IV. COSTS SHOULD BE BORNE BY THE ENTITIES THAT BENEFIT FROM NANP ADMINISTRATION

It is hard to address the issue of funding alternatives without knowing what form the new NANP administration will take.

³NPRM at para. 18.

⁴NPRM at para. 29.

In any case, OPASTCO agrees with the Commission's plan for future funding which will establish a funding mechanism payable by those who are assigned or who otherwise benefit from the use and regulation of telephone numbers. The funds should be payable directly to ATIS.

OPASTCO believes that an ATIS-sponsored oversight committee would incur minimal costs. The small costs of the administration of the NANP should, of course, be shared by those entities which use the service.

As for the Commission establishing a NANP fund pool⁵, this would simply create another layer of administration that would require funding of its own. Also, OPASTCO feels that mandating surcharges to existing National Exchange Carrier Association (NECA) funds or using surpluses to support number administration is unnecessary given the expected small costs.

V. FOUR DIGIT CARRIER IDENTIFICATION CODES (CICs) ARE NECESSARY

Four digit CICs are inevitable. OPASTCO agrees that the Commission's six year transition period should ease any transition burdens to this new format. This period will give companies time to absorb the costs involved.

OPASTCO suggests that, in a manner similar to equal access conversion, the FCC not mandate four digit CIC conversion for small telephone companies until a bona fide request is received. Companies receiving such a request would then have at least


⁵NPRM at para. 37.

eighteen months to comply.

VII. CONCLUSION

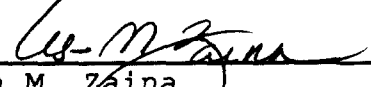
OPASTCO believes that the most impartial and cost-effective NANP administration would be accomplished by an ATIS-sponsored oversight committee. This committee, given ATIS' expanded industry support, experience, and expertise with numbering forums, would certainly be well qualified to assume these responsibilities. OPASTCO feels that the ATIS-sponsored industry oversight committee, with FCC oversight, eliminates the need to create a new entity to design and administer the NANP. Also, this committee would be able to assume the additional responsibilities regarding the variety of other numbering issues.

As for funding, OPASTCO supports an equitable funding mechanism, payable directly to ATIS. OPASTCO believes an ATIS-sponsored oversight committee is the most efficient, low-cost alternative, eliminating the need for a separate NANP pool or the use of other funds' surpluses.

By: 
Matthew L. Bosch
Manager - Regulatory and
Legislative Affairs

Respectfully submitted,

**THE ORGANIZATION FOR THE
PROTECTION AND ADVANCEMENT
OF SMALL TELEPHONE COMPANIES**

By: 
Lisa M. Zaina
General Counsel

OPASTCO
21 Dupont Circle, NW
Suite 700
Washington, DC 20036
202/659-5990

June 7, 1994